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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION**

UNITED STATES OF AMERICA,
Plaintiff,
v.
BRUCE BOONE WANN
Defendant.

CASE NO: 18-CR-54-M-DLC
**UNOPPOSED MOTION
TO CONTINUE CHANGE OF PLEA
HEARING**

Comes now, the Defendant, by and through counsel, pursuant to L.R.CR 47.1 and Fed.R.Crim.P. 47, and Moves to Continue the Hearing set for Defendant's Change of Plea currently set for Tuesday, November 20, 2018 at 3:00 p.m. at the Russell Smith Courthouse. In support of this Motion, Defendant shows as follows:

1. Pursuant to L.R.CR 47.1(a), counsel for the Defendant states that he has contacted counsel for the Government and the Government is not opposed to the relief requested in this Motion.
2. Pursuant to Fed.R.Crim.P. 47(a), Defendant states that this Motion is based

on the following grounds:

- a. The Court's inherent authority to manage its docket. *Ready Transp. Inc. v. AAR Mfg., Inc.*, 627 F.3d 402, 404 (9th Cir. 2010).
3. Pursuant to Fed.R.Crim.P. 47(a), Defendant states that this Motion requests the following relief:
 - a. That the Change of Plea Hearing be continued and take place on a date and time on which Counsel does not have a conflict. Counsel has conflicts on the following dates:
 - i. November 19 through 23, 2018: Counsel was going to be out of the State of Montana during the Thanksgiving Holiday.
 - ii. November 27, 2018 at 10:00 a.m: Initial Appearance in Glendive, (Dawson County), Montana.
 - iii. November 29, 2018 at 10:00 a.m. Change of Plea conducted via video conferencing with counsel and defendant present in the Russell Smith Courthouse in Missoula, Montana.
 - iv. December 5 and 6, 2018: Jury Trial in Municipal Court of the City of Missoula.
 - v. December 18, 2018: Jury Trial status hearing in Terry, (Prairie County). Montana.
4. Pursuant to L.R.CR 47.1(c), a proposed order is attached to this Motion;

5. As required by L.R.CR 47.2(a), this motion is accompanied by a brief, filed separate and at the same time as this motion.

WHEREFORE, Defendant, for the reasons set forth above and for such other good cause as the Court may determine, requests that the Court enter an order consistent with the relief requested above.

Dated this 15th day of November, 2018.

/s/ Shandor S. Badaruddin

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CERTIFICATE OF SERVICE

All parties in in this action are represented by counsel who are also registered users. Pursuant to L.C.R. 1 and L.R. 1.4(c)(2), registered users were served by electronic filing pursuant to Fed.R.Crim.P. 49. Pursuant to L.R. 1.4(c)(2), the NEF is the certificate of service for these individuals.

Dated this 15th day of November, 2018.

/s/ Shandor S. Badaruddin

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